

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

DESIRAE LANTRY, individually, and on )		
behalf of all others similarly situated, )		
	)	CASE NO. 4:18-cv-01694-RWS
<i>Plaintiff,</i>	)	
	)	MOTION FOR EXTENSION OF
v.	)	DEADLINES
	)	
CLIENT SERVICES, INC.	)	
	)	
<i>Defendant.</i>	)	

**DEFENDANT CLIENT SERVICES, INC.’S CONSENT MOTION FOR EXTENSION OF  
DEADLINES FOR BRIEFING MOTION FOR JUDGMENT ON THE PLEADINGS,  
RESPONSE, AND REPLY**

With the consent of Plaintiff’s counsel, Defendant Client Services, Inc. (“CSI”) files its Motion for extension of deadlines and requests the following:

1. The February 22, 2019 deadline for Defendant to file a Motion for Judgment on the Pleadings be extended to February 27, 2019;
2. The deadline for Plaintiff’s response to the Motion for Judgment on the Pleadings be extended five days to March 27, 2019;
3. Defendant’s reply to Plaintiff’s response to Motion for Judgment on the Pleadings be extended to April 8, 2019.
4. Undersigned counsel is reviewing additional authorities and finalizing briefing of its motion.
5. This motion, and the relief requested, is consented to by Plaintiff’s counsel.

WHEREFORE, Defendant Client Services, Inc. respectfully requests extensions to the deadlines set in the Court’s January 23, 2019 scheduling order as set forth above.

Dated: February 22, 2019

Respectfully submitted,

/s/ PATRICK A. WATTS

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***COUNSEL FOR Defendant***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been electronically filed **via CM/ECF**, which will automatically send email notification of such filing to the following known counsel of record on this February 22, 2019, to:

**James Constantine Vlahakis**

**Marwan Rocco Daher**

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/s/ Patrick A. Watts

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